

EXHIBIT K

April 7, 2020

VIA E-MAIL

Gaspard Rappoport
Kelly DiBlasi
Gabriel Morgan
Gregory Silbert
Reed Collins
WEIL, GOTSHAL & MANGES LLP
767 Fifth Avenue
New York, New York 10153

John Hughes, III
Atara Miller
Grant Mainland
MILBANK LLP
55 Hudson Yards
New York, New York 10001

Howard Hawkins
Mark Ellenberg
William Natbony
Casey Servais
CADWALADER, WICKERSHAM & TAFT LLP
200 Liberty Street
New York, New York 10281

Jason Callen
Martin Sosland
BUTLER SNOW LLP
5430 Lyndon B. Johnson Freeway, Suite 1200
Dallas, Texas 75240
1530 3rd Avenue South, Suite 1600
Nashville, Tennessee 37201

**Re: In re Fin. Oversight & Mgmt. Bd., No. 17-BK-3283-LTS – Discovery on Lift Stay
Motions – Movants’ Letter Dated March 30, 2020**

Counsel:

We write in response to your March 30, 2020 letter (“March 30 Letter”). We have already produced much of the material that your letter characterizes as “Outstanding Information.” In the spirit of cooperation, below we identify the bates numbers of each requested document in our production.

The March 30 Letter also makes several new requests for documents and information that are not tied to Movants’ previous document requests, much less any categories of information as to which the Court has authorized discovery. At this late stage, it is not proper for Movants to propound new requests (especially when they have no, or at best dubious, relevance to the issues before the Court). In a few instances as set forth below, AAFAF can agree, in the spirit of cooperation, to search for some additional documents. By doing so, AAFAF does not waive but expressly reserves all arguments that such materials are not relevant to the issues to be decided at the preliminary hearing.

Our responses to your specific requests are set forth below.

CCDA Requests

1. Account Opening Documents

Alleged Outstanding Information	AAFAF's Response
<u>Scotiabank:</u> <ul style="list-style-type: none"> Public Funds Account (A/C No. [REDACTED] 5138) Public Funds Account (A/C No. [REDACTED] 5142) Public Funds Account (A/C No. [REDACTED] 5144) 	AAFAF addressed this request by letter dated March 31, 2020. See Letter from E. McKeen to Movants at 2 (Mar. 31, 2020).
<u>Banco Popular:</u> <ul style="list-style-type: none"> Room Tax (Impuesto de Hospederia) (A/C No. [REDACTED] 6545) Computadora Suplidores (Laser) (A/C No. [REDACTED] 2306) Hacienda Operacional (A/C No. [REDACTED] 4958) 	AAFAF addressed this request by letter dated March 31, 2020. See Letter from E. McKeen to Movants at 2 (Mar. 31, 2020). Please note the account number is [REDACTED] 9458, not [REDACTED] 958.
<u>FirstBank:</u> <ul style="list-style-type: none"> Sweep Concentration (A/C No. [REDACTED] 2984) 	AAFAF addressed this request by letter dated March 31, 2020. See Letter from E. McKeen to Movants at 2 (Mar. 31, 2020).
<u>FirstBank</u> <ul style="list-style-type: none"> Debt Service Reserve account (A/C No. [REDACTED] 3961) 	AAFAF addressed this request by letter dated March 31, 2020. See Letter from E. McKeen to Movants at 2 (Mar. 31, 2020).
<u>GDB:</u> <ul style="list-style-type: none"> Operacional (A/C No. [REDACTED] 0006) 	AAFAF addressed this request by letter dated March 31, 2020. See Letter from E. McKeen to Movants at 2 (Mar. 31, 2020).
<u>BONY:</u> <ul style="list-style-type: none"> BNYM PRCCDA Ser A Bd Pymt Fd (A/C No. [REDACTED] 6334) 	AAFAF addressed this request by letter dated March 31, 2020. See Letter from E. McKeen to Movants at 2 (Mar. 31, 2020).
<u>GDB:</u> <ul style="list-style-type: none"> PAGO DELA DEUDA EMISION DE BONO PRC (A/C No. [REDACTED] 9947) 	AAFAF addressed this request by letter dated March 31, 2020. See Letter from E. McKeen to Movants at 2 (Mar. 31, 2020). Please note the account number is [REDACTED] 9947, not [REDACTED] 9947.

2. Account Statements:

Alleged Outstanding Information	AAFAF's Response
<p><u>FirstBank:</u></p> <ul style="list-style-type: none"> • Debt Service Reserve (A/C No. [REDACTED] 3961): <ul style="list-style-type: none"> ○ No statements for Jan. 2015 – Nov. 2015, Jan. 2016 – Mar. 2016, Jan. 2017 – Mar. 2017, and Jan. 2018 – Mar. 2018. 	<p>This account was opened December 29, 2015, so there are no statements for Jan. 2015 - Nov. 2015. See CCDA_STAY0013885 - CCDA_STAY0013922 (account opening documents). The remaining statements referenced were produced on March 26, 2020.¹</p>
<p><u>FirstBank:</u></p> <ul style="list-style-type: none"> • Debt Service Reserve (A/C No. [REDACTED] 3961): <ul style="list-style-type: none"> ○ No statements for Jan. 2015 – Feb. 2020, with exception of Mar. 2016, Feb. 2018, Mar. 2018, Feb. 2019, and June 2019. 	<p>This account was opened December 29, 2015, so there are no statements for 2015. See CCDA_STAY0013885 - CCDA_STAY0013922 (account opening statements). The remaining statements were produced on March 26, 2020. See CCDA_STAY0013926 - CCDA_STAY0014039.</p>
<p><u>FirstBank:</u></p> <ul style="list-style-type: none"> • TDF Guaranteed Hotels Debt Service (A/C No. [REDACTED] 3972): <ul style="list-style-type: none"> ○ No statements for Jan. 2015 – June 2017 and June 2018 – Feb. 2020. 	<p>AAFAF conducted a reasonably diligent investigation to identify accounts that received the revenues at issue in the lift stay motion. AAFAF has produced bank account statements for the accounts it identified and has provided a summary of the flow of funds to assist Movants in understanding the materials provided. This account was not identified as having received any of the occupancy tax revenues at issue in the</p>

¹ See CCDA_STAY0013926 - CCDA_STAY0013927 (Jan. 2016); CCDA_STAY0013948 - CCDA_STAY0013949 (Feb. 2016); CCDA_STAY0013952 - CCDA_STAY0013955 (Mar. 2016); CCDA_STAY0013928 - CCDA_STAY0013929 (Jan. 2017); CCDA_STAY0013939 - CCDA_STAY0013940 (Feb. 2017); CCDA_STAY0013956 - CCDA_STAY0013957 (Mar. 2017); CCDA_STAY0013930 - CCDA_STAY0013931 (Jan. 2018); CCDA_STAY0013936 - CCDA_STAY0013938 (Feb. 2018); CCDA_STAY0013941 - CCDA_STAY0013944 (Feb. 2018); CCDA_STAY0013958 - CCDA_STAY0013960 (Mar. 2018).

Alleged Outstanding Information	AAFAF's Response
	CCDA lift stay motion. Accordingly, AAFAF will not provide these additional statements.
<p><u>FirstBank:</u></p> <ul style="list-style-type: none"> • Tragamonedas (A/C No. [REDACTED] 3017): <ul style="list-style-type: none"> ○ No statements for Jan. 2015 – June 2017 and June 2018 – Feb. 2020, with exception of June 2019. 	AAFAF conducted a reasonably diligent investigation to identify accounts that received the revenues at issue in the lift stay motion. AAFAF has produced bank account statements for the accounts it identified and has provided a summary of the flow of funds to assist Movants in understanding the materials provided. This account was not identified as having received any of the occupancy tax revenues at issue in the CCDA lift stay motion. Accordingly, AAFAF will not provide these additional statements.
<p><u>FirstBank:</u></p> <ul style="list-style-type: none"> • Hotel Development Corporation (A/C No. [REDACTED] 3028): <ul style="list-style-type: none"> ○ No statements for Jan. 2015 – June 2017 and June 2018 to Feb. 2020. 	AAFAF conducted a reasonably diligent investigation to identify accounts that received the revenues at issue in the lift stay motion. AAFAF has produced bank account statements for the accounts it identified and has provided a summary of the flow of funds to assist Movants in understanding the materials provided. This account was not identified as having received any of the occupancy tax revenues at issue in the CCDA lift stay motion. Accordingly, AAFAF will not provide these additional statements.
<p><u>FirstBank:</u></p> <ul style="list-style-type: none"> • PRMTC (A/C No. [REDACTED] 3006): <ul style="list-style-type: none"> ○ No statements for Jan. 2015 – June 2017 and June 2018 – Feb. 20 	AAFAF conducted a reasonably diligent investigation to identify accounts that received the revenues at issue in the lift stay motion. AAFAF has produced bank account statements for the accounts it identified and has provided a summary of the flow of funds to assist Movants in understanding the materials provided. This account was not identified as having received any of the occupancy tax revenues at issue in the CCDA lift stay motion. Accordingly, AAFAF will not provide these additional statements.
<p><u>FirstBank:</u></p> <ul style="list-style-type: none"> • PRHRISA (A/C No. 0* [REDACTED] 2973): <ul style="list-style-type: none"> ○ No statements for Jan. 2015 – June 2017 and 	AAFAF conducted a reasonably diligent investigation to identify accounts that received the revenues at issue in the lift stay motion. AAFAF has produced bank account statements for the accounts it identified and has provided a summary

Alleged Outstanding Information	AAFAF's Response
June 2018 – Feb. 2020.	of the flow of funds to assist Movants in understanding the materials provided. This account was not identified as having received any of the occupancy tax revenues at issue in the CCDA lift stay motion. Accordingly, AAFAF will not provide these additional statements.
<u>FirstBank:</u> <ul style="list-style-type: none"> • Cile (A/C No. [REDACTED] 3050): <ul style="list-style-type: none"> ○ No statements for Jan. 2015 – June 2017 and June 2018 – Feb. 2020. 	AAFAF conducted a reasonably diligent investigation to identify accounts that received the revenues at issue in the lift stay motion. AAFAF has produced bank account statements for the accounts it identified and has provided a summary of the flow of funds to assist Movants in understanding the materials provided. This account was not identified as having received any of the occupancy tax revenues at issue in the CCDA lift stay motion. Accordingly, AAFAF will not provide these additional statements.
<u>FirstBank:</u> <ul style="list-style-type: none"> • Suppliers Payments (A/C No. [REDACTED] 2962): <ul style="list-style-type: none"> ○ No statements for Jan. 2015 – June 2017 and June 2018 – Feb. 2020. 	AAFAF conducted a reasonably diligent investigation to identify accounts that received the revenues at issue in the lift stay motion. AAFAF has produced bank account statements for the accounts it identified and has provided a summary of the flow of funds to assist Movants in understanding the materials provided. This account was not identified as having received any of the occupancy tax revenues at issue in the CCDA lift stay motion. Accordingly, AAFAF will not provide these additional statements.
<u>FirstBank:</u> <ul style="list-style-type: none"> • Payroll (A/C No. [REDACTED] 2995): <ul style="list-style-type: none"> ○ No statements for Jan. 2015 – June 2017 and June 2018 – Feb. 2020, except for June 2019. 	AAFAF conducted a reasonably diligent investigation to identify accounts that received the revenues at issue in the lift stay motion. AAFAF has produced bank account statements for the accounts it identified and has provided a summary of the flow of funds to assist Movants in understanding the materials provided. This account was not identified as having received any of the occupancy tax revenues at issue in the CCDA lift stay motion. Accordingly, AAFAF will not provide these additional statements.

Alleged Outstanding Information	AAFAF's Response
<p><u>GDB:</u></p> <ul style="list-style-type: none"> • Ley 77-Incautaciones (A/C No. [REDACTED] 4978): <ul style="list-style-type: none"> ○ No statements for Jan. 2015 – Oct. 2015 and Apr. 2016 – Feb. 2020. 	<p>AAFAF conducted a reasonably diligent investigation to identify accounts that received the revenues at issue in the lift stay motion. AAFAF has produced bank account statements for the accounts it identified and has provided a summary of the flow of funds to assist Movants in understanding the materials provided. This account was not identified as having received any of the occupancy tax revenues at issue in the CCDA lift stay motion. Accordingly, AAFAF will not provide these additional statements.</p>
<p><u>GDB:</u></p> <ul style="list-style-type: none"> • Sweep Concentration (A/C No. [REDACTED] 2984): <ul style="list-style-type: none"> ○ No statements for Jan. 2015 – Feb. 2020, except for May 2018. 	<p>This account was opened December 30, 2015, so there are no statements before that date. See CCDA_STAY0013856 - CCDA_STAY0013884 (account opening statements). The remaining account statements have been produced.² Please note this is a FirstBank account, not a GDB account.</p>
<p><u>GDB:</u></p> <ul style="list-style-type: none"> • Operacional (A/C No. [REDACTED] 0006): <ul style="list-style-type: none"> ○ No statements for Nov. 2018 – Feb. 2020. 	<p>GDB's restructuring was completed in November 2018. AAFAF has not located any statements for this account after that date. Moreover, the TSA Operational Account is now--and has been--located at Banco Popular Account No. [REDACTED] 9458 since April 2016, and AAFAF has provided the account statements for that account.³</p>
<p><u>BONY:</u></p> <ul style="list-style-type: none"> • BNYM PRCCDA A Constr Sub (A/C No. [REDACTED] 6338): <ul style="list-style-type: none"> ○ No statements for Mar. 2016 – Dec. 2016, Apr. 	<p>AAFAF has produced all statements for this account that it received from Tourism and from BONY, which satisfies AAFAF's production</p>

² See CCDA_STAY0014165 - CCDA_STAY0014166; CCDA_STAY0014183 - CCDA_STAY0014184; CCDA_STAY0014189 - CCDA_STAY0014190, CCDA_STAY0014198 - CCDA_STAY0014199, CCDA_STAY0014206 - CCDA_STAY0014207, CCDA_STAY0014214 - CCDA_STAY0014215, CCDA_STAY0014223 - CCDA_STAY0014224, CCDA_STAY0014231 - CCDA_STAY0014232, CCDA_STAY0014239 - CCDA_STAY0014240, CCDA_STAY0014249 - CCDA_STAY0014250, CCDA_STAY0014258 - CCDA_STAY0014259, CCDA_STAY0014269 - CCDA_STAY0014270, CCDA_STAY0014167 - CCDA_STAY0014168, CCDA_STAY0014177 - CCDA_STAY0014178, CCDA_STAY0014191 - CCDA_STAY0014192, CCDA_STAY0014200 - CCDA_STAY0014201, CCDA_STAY0014208 - CCDA_STAY0014209, CCDA_STAY0014216 - CCDA_STAY0014217 (Jan. 2016 to June 2017); CCDA_STAY0007442 - CCDA_STAY0007514 (July 2017 to Jan. 2020); CCDA_STAY0014185 - CCDA_STAY0014188 (Feb. 2020).

³ See CW_STAY0006906 - CW_STAY0009481, CW_STAY0010563 - CW_STAY0010566, CW_STAY0000022 - CW_STAY0000080, CW_STAY0000088 - CW_STAY0000149.

Alleged Outstanding Information	AAFAF's Response
2018 – Dec. 2018, and Feb. 2019.	obligations. ⁴
<u>BONY:</u> <ul style="list-style-type: none"> BNYM PRCCDA A Earnings Sub (A/C No. ■■■6337): <ul style="list-style-type: none"> No statements for Apr. 2016 – Dec. 2016 and Apr. 2018 – Dec. 2018. 	AAFAF has produced all statements for this account that it received from Tourism and from BONY, which satisfies AAFAF's production obligations. ⁵
<u>BONY:</u> <ul style="list-style-type: none"> BNYM PRCCDA A Loan Pymt Sub (A/C No. ■■■6339): <ul style="list-style-type: none"> No statements for Apr. 2016 – Dec. 2016. 	AAFAF has produced all statements for this account that it received from Tourism and from BONY, which satisfies AAFAF's production obligations. ⁶

⁴ See CCDA_STAY0012891 - CCDA_STAY0012898, CCDA_STAY0012937 - CCDA_STAY0012944, CCDA_STAY0012992 - CCDA_STAY0013041, CCDA_STAY0013080 - CCDA_STAY0013087, CCDA_STAY0013132 - CCDA_STAY0013178, CCDA_STAY0013217 - CCDA_STAY0013224, CCDA_STAY0013266 - CCDA_STAY0013273, CCDA_STAY0013313 - CCDA_STAY0013320, CCDA_STAY0013359 - CCDA_STAY0013367, CCDA_STAY0013405 - CCDA_STAY0013406, CCDA_STAY0013410 - CCDA_STAY0013415, CCDA_STAY0013451 - CCDA_STAY0013452, CCDA_STAY0013456 - CCDA_STAY0013461, CCDA_STAY0013498 - CCDA_STAY0013499, CCDA_STAY0013503 - CCDA_STAY0013509, CCDA_STAY0013545 - CCDA_STAY0013549, CCDA_STAY0013553 - CCDA_STAY0013558, CCDA_STAY0013596 - CCDA_STAY0013599, CCDA_STAY0013602 - CCDA_STAY0013605, CCDA_STAY0013643 - CCDA_STAY0013650, CCDA_STAY0013691 - CCDA_STAY0013693, CCDA_STAY0013718 - CCDA_STAY0013722, CCDA_STAY0013748 - CCDA_STAY0013758.

⁵ See CCDA_STAY0012931 - CCDA_STAY0012936, CCDA_STAY0012978 - CCDA_STAY0012983, CCDA_STAY0013028 - CCDA_STAY0013033, CCDA_STAY0013074 - CCDA_STAY0013079, CCDA_STAY0013119 - CCDA_STAY0013124, CCDA_STAY0013162 - CCDA_STAY0013163, CCDA_STAY0013166 - CCDA_STAY0013169, CCDA_STAY0013208 - CCDA_STAY0013209, CCDA_STAY0013213 - CCDA_STAY0013216, CCDA_STAY0013256 - CCDA_STAY0013259, CCDA_STAY0013262 - CCDA_STAY0013265, CCDA_STAY0013303 - CCDA_STAY0013306, CCDA_STAY0013350 - CCDA_STAY0013355, CCDA_STAY0013399 - CCDA_STAY0013450, CCDA_STAY0013492 - CCDA_STAY0013497, CCDA_STAY0013539 - CCDA_STAY0013544, CCDA_STAY0013590 - CCDA_STAY0013595, CCDA_STAY0013637 - CCDA_STAY0013642, CCDA_STAY0013685 - CCDA_STAY0013690, CCDA_STAY0013714 - CCDA_STAY0013717, CCDA_STAY0013744 - CCDA_STAY0013747, CCDA_STAY0013789 - CCDA_STAY0013794.

⁶ See CCDA_STAY0012899 - CCDA_STAY0012902, CCDA_STAY0012906 - CCDA_STAY0012907, CCDA_STAY0012945 - CCDA_STAY0012950, CCDA_STAY0012993 - CCDA_STAY0012998, CCDA_STAY0013042 - CCDA_STAY0013047, CCDA_STAY0013088 - CCDA_STAY0013093, CCDA_STAY0013133 - CCDA_STAY0013138, CCDA_STAY0013179 - CCDA_STAY0013184, CCDA_STAY0013225 - CCDA_STAY0013230, CCDA_STAY0013274 - CCDA_STAY0013279, CCDA_STAY0013321 - CCDA_STAY0013326, CCDA_STAY0013368 - CCDA_STAY0013373, CCDA_STAY0013416 - CCDA_STAY0013421, CCDA_STAY0013462 - CCDA_STAY0013467, CCDA_STAY0013510 - CCDA_STAY0013515, CCDA_STAY0013559 - CCDA_STAY0013564, CCDA_STAY0013606 - CCDA_STAY0013611, CCDA_STAY0013655 - CCDA_STAY0013660, CCDA_STAY0013696 - CCDA_STAY0013699, CCDA_STAY0013723 - CCDA_STAY0013724, CCDA_STAY0013727 - CCDA_STAY0013728, CCDA_STAY0013759 - CCDA_STAY0013762, CCDA_STAY0013765 - CCDA_STAY0013766.

Alleged Outstanding Information	AAFAF's Response
<p><u>BONY:</u></p> <ul style="list-style-type: none"> BNYM PRCCDA Ser A Bd Pymt Fd (A/C No. [REDACTED] 6334): <ul style="list-style-type: none"> No statements for Mar. 2016 – Dec. 2016, May 2017, Apr. 2018 – Dec. 2018, and Feb. 2019. 	<p>AAFAF has produced all statements for this account that it received from Tourism and from BONY, which satisfies AAFAF's production obligations.⁷</p>
<p><u>BONY:</u></p> <ul style="list-style-type: none"> BNYM PRCCDA Ser A D/S/R Fd (A/C No. [REDACTED] 6343): <ul style="list-style-type: none"> No statements for Apr. 2016 – Dec. 2016 and Apr. 2018 – Dec. 2018. 	<p>AAFAF has produced all statements for this account that it received from Tourism and from BONY, which satisfies AAFAF's production obligations.⁸</p>

⁷ See CCDA_STAY0012903 - CCDA_STAY0012905, CCDA_STAY0012908 - CCDA_STAY0012909, CCDA_STAY0012928 - CCDA_STAY0012930, CCDA_STAY0012951 - CCDA_STAY0012952, CCDA_STAY0012962 - CCDA_STAY0012964, CCDA_STAY0012975 - CCDA_STAY0012977, CCDA_STAY0013001 - CCDA_STAY0013002, CCDA_STAY0013020 - CCDA_STAY0013027, CCDA_STAY0013050 - CCDA_STAY0013051, CCDA_STAY0013068 - CCDA_STAY0013073, CCDA_STAY0013098 - CCDA_STAY0013099, CCDA_STAY0013114 - CCDA_STAY0013118, CCDA_STAY0013143 - CCDA_STAY0013144, CCDA_STAY0013159 - CCDA_STAY0013161, CCDA_STAY0013164 - CCDA_STAY0013165, CCDA_STAY0013189 - CCDA_STAY0013190, CCDA_STAY0013205 - CCDA_STAY0013207, CCDA_STAY0013210 - CCDA_STAY0013212, CCDA_STAY0013237 - CCDA_STAY0013239, CCDA_STAY0013252 - CCDA_STAY0013255, CCDA_STAY0013260 - CCDA_STAY0013261, CCDA_STAY0013286 - CCDA_STAY0013287, CCDA_STAY0013300 - CCDA_STAY0013302, CCDA_STAY0013307 - CCDA_STAY0013312, CCDA_STAY0013335 - CCDA_STAY0013336, CCDA_STAY0013347 - CCDA_STAY0013349, CCDA_STAY0013356 - CCDA_STAY0013358, CCDA_STAY0013382 - CCDA_STAY0013384, CCDA_STAY0013395 - CCDA_STAY0013398, CCDA_STAY0013407 - CCDA_STAY0013409, CCDA_STAY0013432 - CCDA_STAY0013433, CCDA_STAY0013442 - CCDA_STAY0013444, CCDA_STAY0013453 - CCDA_STAY0013455, CCDA_STAY0013478 - CCDA_STAY0013479, CCDA_STAY0013488 - CCDA_STAY0013491, CCDA_STAY0013500 - CCDA_STAY0013502, CCDA_STAY0013528 - CCDA_STAY0013529, CCDA_STAY0013536 - CCDA_STAY0013538, CCDA_STAY0013550 - CCDA_STAY0013552, CCDA_STAY0013578 - CCDA_STAY0013579, CCDA_STAY0013586 - CCDA_STAY0013589, CCDA_STAY0013600 - CCDA_STAY0013601, CCDA_STAY0013626 - CCDA_STAY0013628, CCDA_STAY0013633 - CCDA_STAY0013636, CCDA_STAY0013651 - CCDA_STAY0013654, CCDA_STAY0013676 - CCDA_STAY0013677, CCDA_STAY0013682 - CCDA_STAY0013684, CCDA_STAY0013694 - CCDA_STAY0013695, CCDA_STAY0013712 - CCDA_STAY0013713, CCDA_STAY0013725 - CCDA_STAY0013726, CCDA_STAY0013741 - CCDA_STAY0013743, CCDA_STAY0013763 - CCDA_STAY0013764, CCDA_STAY0013785 - CCDA_STAY0013788, CCDA_STAY0013795 - CCDA_STAY0013797.

⁸ See CCDA_STAY0012916 - CCDA_STAY0012921, CCDA_STAY0012959 - CCDA_STAY0012961, CCDA_STAY0012965 - CCDA_STAY0012968, CCDA_STAY0013007 - CCDA_STAY0013013, CCDA_STAY0013056 - CCDA_STAY0013061, CCDA_STAY0013102 - CCDA_STAY0013107, CCDA_STAY0013147 - CCDA_STAY0013152, CCDA_STAY0013193 - CCDA_STAY0013198, CCDA_STAY0013240 - CCDA_STAY0013245, CCDA_STAY0013288 - CCDA_STAY0013293, CCDA_STAY0013333 - CCDA_STAY0013334, CCDA_STAY0013337 - CCDA_STAY0013340, CCDA_STAY0013380 - CCDA_STAY0013388, CCDA_STAY0013428 - CCDA_STAY0013435, CCDA_STAY0013474 - CCDA_STAY0013481, CCDA_STAY0013522 - CCDA_STAY0013527, CCDA_STAY0013571 - CCDA_STAY0013577, CCDA_STAY0013618 - CCDA_STAY0013623, CCDA_STAY0013667 - CCDA_STAY0013673, CCDA_STAY0013704 - CCDA_STAY0013707, CCDA_STAY0013733 - CCDA_STAY0013736, CCDA_STAY0013773 - CCDA_STAY0013778

Alleged Outstanding Information	AAFAF's Response
<p>BONY:</p> <ul style="list-style-type: none"> BNYM PRCCDA Ser A Fin AGMTS F (A/C No. ■■■6342): <ul style="list-style-type: none"> No statements for Apr. 2016 – Dec. 2016, Apr. 2018 – Dec. 2018, and May 2019. 	<p>AAFAF has produced all statements for this account that it received from Tourism and from BONY, which satisfies AAFAF's production obligations.⁹</p>
<p>BONY:</p> <ul style="list-style-type: none"> BNYM PRCCDA Ser A Rebate Fd (A/C No. ■■■6344): <ul style="list-style-type: none"> No statements for Apr. 2016 – Dec. 2016 and Apr. 2018 – Dec. 2018. 	<p>AAFAF has produced all statements for this account that it received from Tourism and from BONY, which satisfies AAFAF's production obligations.¹⁰</p>

3. Additional Allegedly Outstanding Information:

Topic	AAFAF's Response
<p>Confirmation that: (1) the assets of GDB passed to the GDB Debt Recovery Authority; (2) such assets were passed from GDB to the GDB Debt Recovery Authority subject to CCDA bondholders' lien; and (3) CCDA bondholders did not consent to any impairment of their property rights in</p>	<p>This is not a request for documents or clarification—it is a legal argument. The record of the GDB Restructuring proceeding speaks for itself. For the reasons stated below, AAFAF will not “confirm” Movants’ legal argument.</p> <p>Pursuant to Act 109 of 2017 (CCDA_STAY0014040 - CCDA_STAY0014108),</p>

⁹ See CCDA_STAY0012910 - CCDA_STAY0012915, CCDA_STAY0012953 - CCDA_STAY0012958, CCDA_STAY0012999 - CCDA_STAY0013006, CCDA_STAY0013048 - CCDA_STAY0013055, CCDA_STAY0013094 - CCDA_STAY0013097, CCDA_STAY0013100 - CCDA_STAY0013101, CCDA_STAY0013139 - CCDA_STAY0013142, CCDA_STAY0013145 - CCDA_STAY0013146, CCDA_STAY0013185 - CCDA_STAY0013188, CCDA_STAY0013191 - CCDA_STAY0013192, CCDA_STAY0013231 - CCDA_STAY0013236, CCDA_STAY0013280 - CCDA_STAY0013285, CCDA_STAY0013327 - CCDA_STAY0013332, CCDA_STAY0013374 - CCDA_STAY0013379, CCDA_STAY0013422 - CCDA_STAY0013427, CCDA_STAY0013468 - CCDA_STAY0013473, CCDA_STAY0013516 - CCDA_STAY0013521, CCDA_STAY0013565 - CCDA_STAY0013570, CCDA_STAY0013612 - CCDA_STAY0013617, CCDA_STAY0013661 - CCDA_STAY0013666, CCDA_STAY0013700 - CCDA_STAY0013703, CCDA_STAY0013729 - CCDA_STAY0013732, CCDA_STAY0013767 - CCDA_STAY0013772

¹⁰ See CCDA_STAY0012922 - CCDA_STAY0012927, CCDA_STAY0012969 - CCDA_STAY0012974, CCDA_STAY0013014 - CCDA_STAY0013019, CCDA_STAY0013062 - CCDA_STAY0013067, CCDA_STAY0013108 - CCDA_STAY0013113, CCDA_STAY0013153 - CCDA_STAY0013158, CCDA_STAY0013199 - CCDA_STAY0013204, CCDA_STAY0013246 - CCDA_STAY0013251, CCDA_STAY0013294 - CCDA_STAY0013299, CCDA_STAY0013341 - CCDA_STAY0013346, CCDA_STAY0013389 - CCDA_STAY0013394, CCDA_STAY0013436 - CCDA_STAY0013441, CCDA_STAY0013482 - CCDA_STAY0013487, CCDA_STAY0013530 - CCDA_STAY0013535, CCDA_STAY0013580 - CCDA_STAY0013585, CCDA_STAY0013624 - CCDA_STAY0013632, CCDA_STAY0013674 - CCDA_STAY0013681, CCDA_STAY0013708 - CCDA_STAY0013711, CCDA_STAY0013737 - CCDA_STAY0013740, CCDA_STAY0013779 - CCDA_STAY0013784.

Topic	AAFAF's Response
such assets as part of the restructuring of GDB.	<p>GDB executed a Public Entity Deed of Trust (CCDA_STAY0014145 - CCDA_STAY0014162) to create and establish the GDB Public Entity Trust for the benefit of those certain public entities with deposits at GDB after effectuating the setoffs contemplated by Act 109 (each, a "Designated Depositor"). The Puerto Rico Tourism Company, which collects room tax revenues, is a Designated Depositor (CCDA_STAY0014162). The Public Entity Trust is independent and separate from any other Government Entity (including, without limitation, GDB and the GDB Debt Recovery Authority). Act 109 authorized GDB to transfer Designated Deposits and Public Entity Trust Assets to the Public Entity Trust pursuant to the Public Entity Deed of Trust. Therefore, the Government cannot confirm that all assets of GDB passed to the GDB Debt Recovery Authority. In addition, Act 109, as amended by the Public Entity Deed Trust, provides that notwithstanding "anything in the GDB Restructuring Act or the Ancillary Documents (as defined in the Act) to the contrary, no Government Entity shall have any further rights or claims against GDB, the Recovery Authority and the Public Entity Trust, and any current officers, directors, employees, individual agents and other individual representatives thereof, in their capacity as such, of whatsoever nature and kind, whether now existing or hereinafter arising, based, in whole or in part, on facts, whether known or unknown, existing or occurring on or prior to the Closing Date except for (i) any interest in the Public Entity Trust a Government Entity has pursuant to Article 303 of the GDB Restructuring Act and (ii) any defense a Government Entity may have against any claim asserted against it by the Public Entity Trust or GDB. Each Government Entity is hereby deemed to forever waive, release and discharge GDB, the Recovery Authority and the Public Entity Trust, and any current officers, directors, employees, individual agents and other individual representatives thereof, in their capacity as such, from any and all such claims, except as set forth</p>

Topic	AAFAF's Response
	above. All other claims of Government Entities are reserved.” ¹¹
Identification of which account(s) comprise the Assignment and Coordination Agreement Holding Fund, the Transfer Account, the Surplus Account, and the Pledge Account. The March 25 CCDA Flow-of-Funds Summary is insufficient to satisfy this request.	AAFAF addressed this request by letter dated March 31, 2020. See Letter from E. McKeen to Movants at 5 (Mar. 31, 2020).
Confirmation that, prior to March 6, 2016, all Hotel Taxes were deposited as collected into the Scotiabank “Public Funds Account” (A/C No. [REDACTED] 5142), and have continued to be deposited into that account since March 6, 2016. The March 25 CCDA Flow-of-Funds Summary does not specifically address this request.	AAFAF addressed this request by letter dated March 31, 2020. See Letter from E. McKeen to Movants at 5 (Mar. 31, 2020).
Confirmation that all agreements responsive to CCDA Request 3 have been collected and produced.	Consistent with Judge Dein’s March 5, 2020 Order, AAFAF produced those materials that were located pursuant to a reasonably diligent search.
Instructions to financial institutions, memoranda, letters, and/or agreements related to the movement, transfer, or retention of Hotel Taxes.	Consistent with Judge Dein’s March 5, 2020 Order, AAFAF produced those materials that were located pursuant to a reasonably diligent search.
Confirmation that no additional documents responsive to CCDA Request 6 exist.	Based on a reasonable and diligent search, the Oversight Board has produced all documents responsive to CCDA Request 6.

4. CCDA Flow-of-Funds Summary.

AAFAF can confirm that both accounts identified as “GDB-0006” refer to GDB account [REDACTED] 006.

The account identified as “GDB-6048” refers to GDB account [REDACTED] 6048. On March 13,

¹¹ Capitalized terms in this specific response shall have the meanings ascribed to them in Act 109 of 2017 (CCDA_STAY0014040 - CCDA_STAY0014108).

2020, AAFAF produced the account transaction history for this account from December 2015 (open) to June 2019 (close), which reflects the movement on the account within this time period. CW_STAY0010544 - CW_STAY0010547.

The account identified as “BPPR -9458” refers to Banco Popular account [REDACTED] 9458. On March 16, 2020, AAFAF produced the account statements for this account from March 2016 (open) to February 2020.¹²

AAFAF clarifies that the reference to “GDB -9785” in the March 25 CCDA Flow-of-Funds Summary was intended to read “GDB - 9758.” See Letter from E. McKeen to Movants at 5 (Mar. 31, 2020).

PRIFA Requests

1. Account Opening Documents

Alleged Outstanding Information	AAFAF's Response
<u>GDB:</u> <ul style="list-style-type: none"> Fondo General (A/C No. [REDACTED] 0704) 	AAFAF addressed this request by letter dated March 31, 2020. See Letter from E. McKeen to Movants at 2 (Mar. 31, 2020).
<u>U.S. Bank:</u> <ul style="list-style-type: none"> Puerto Rico Infrastructure Finance Authority Special Tax Revenue Bonds Ser. 1988A Sinking Fund Bond Service Account (A/C No. [REDACTED] 0-002) Puerto Rico Infrastructure Financing Authority Special Tax 	<p>AAFAF addressed this request with respect to Account No. [REDACTED] 0-002 by letter dated March 31, 2020. See Letter from E. McKeen to Movants at 2-3 (Mar. 31, 2020).</p> <p>AAFAF conducted a reasonably diligent investigation to identify accounts that received the revenues at issue in the lift stay motion. AAFAF</p>

¹² CW_STAY0015439-CW_STAY0015439, CW_STAY0015785-CW_STAY0015864, CW_STAY0016203-CW_STAY0016314, CW_STAY0016315-CW_STAY0016426, CW_STAY0016773-CW_STAY0016908, CW_STAY0017211-CW_STAY0017312, CW_STAY0017671-CW_STAY0017788, CW_STAY0018119-CW_STAY0018236, CW_STAY0018563-CW_STAY0018672, CW_STAY0018967-CW_STAY0019068, CW_STAY0019387-CW_STAY0019498, CW_STAY0019793-CW_STAY0019894, CW_STAY0020189-CW_STAY0020294, CW_STAY0020633-CW_STAY0020764, CW_STAY0021059-CW_STAY0021114, CW_STAY0021115-CW_STAY0021226, CW_STAY0021557-CW_STAY0021692, CW_STAY0022015-CW_STAY0022134, CW_STAY0022135-CW_STAY0022202, CW_STAY0022465-CW_STAY0022560, CW_STAY0022874-CW_STAY0022987, CW_STAY0023138-CW_STAY0023223, CW_STAY0023330-CW_STAY0023413, CW_STAY0023580-CW_STAY0023685, CW_STAY0023892-CW_STAY0023993, CW_STAY0024220-CW_STAY0024323, CW_STAY0024534-CW_STAY0024635, CW_STAY0024866-CW_STAY0024973, CW_STAY0025216-CW_STAY0025317, CW_STAY0025551-CW_STAY0025664, CW_STAY0025886-CW_STAY0026005, CW_STAY0026191-CW_STAY0026300, CW_STAY0026506-CW_STAY0026625, CW_STAY0026807-CW_STAY0026916, CW_STAY0027122-CW_STAY0027239, CW_STAY0027417-CW_STAY0027518, CW_STAY0027701-CW_STAY0027812, CW_STAY0027991-CW_STAY0028096, CW_STAY0028279-CW_STAY0028388, CW_STAY0028595-CW_STAY0028734, CW_STAY0028960-CW_STAY0029075, CW_STAY0029297-CW_STAY0029438, CW_STAY0029656-CW_STAY0029779, CW_STAY0030009-CW_STAY0030126, CW_STAY0030345-CW_STAY0030452, CW_STAY0030659-CW_STAY0030778, CW_STAY0031005-CW_STAY0031128, CW_STAY0031315-CW_STAY0031412, CW_STAY0031607-CW_STAY0031724, CW_STAY0031887 CW_STAY0031980, CW_STAY0032171 CW_STAY0032268.

Alleged Outstanding Information	AAFAF's Response
Revenue Bonds Series 2005C, 2005 Construction Account (A/C No. [REDACTED] 2004)	has produced bank account statements for the accounts it identified and has provided a summary of the flow of funds to assist Movants in understanding the materials provided. Account [REDACTED] 2004 was not identified as having received any of the rum tax revenues at issue in the PRIFA lift-stay motion. Accordingly, AAFAF will not provide these documents.
<u>Banco Popular:</u> <ul style="list-style-type: none"> General Funds (A/C No. [REDACTED] 858) Hacienda Operacional (A/C No. [REDACTED] 9458) Accounts identified as "BPPR - 9458" and "BPPR - 2882" in the PRIFA flow-of-funds summary the Government Parties provided on March 21, 2020 (the "PRIFA Flow-of-Funds Summary"). 	<p>AAFAF addressed this request with respect to Account Nos. -9458 and -2882 by letter dated March 31, 2020. See Letter from E. McKeen to Movants at 2 (Mar. 31, 2020).</p> <p>AAFAF conducted a reasonably diligent investigation to identify accounts that received the revenues at issue in the lift stay motion. AAFAF has produced bank account statements for the accounts it identified and has provided a summary of the flow of funds to assist Movants in understanding the materials provided. Account [REDACTED] 2858 was not identified as having received any of the rum tax revenues at issue in the PRIFA lift-stay motion. Nonetheless, AAFAF produced the opening documents for this account at PRIFA_STAY0003502 - PRIFA_STAY0003517.</p>
<u>Citibank:</u> <ul style="list-style-type: none"> Account that was used to transfer debt service payments between GDB Account No. [REDACTED] 1891 and U.S. Bank Account No. [REDACTED] 0-002. 	The GDB -1891 statements AAFAF produced show transfers to the US Bank Account. <i>E.g.</i> , PRIFA_STAY0004151. The U.S. Bank statements produced show receipt of these amounts on the same day. <i>E.g.</i> , PRIFA_STAY0004665. We will follow up on the reference to Citibank in US Bank's statements under separate cover.

2. Additional Allegedly Outstanding Information.

Topic	AAFAF's Response
Account statements, from January 1, 2014 to present, for the Citibank account that was used to transfer debt service payments between GDB Account No. [REDACTED] 1891 and U.S. Bank Account No. [REDACTED]	See above.

Topic	AAFAP's Response
0-002. Comprehensive set of 2016 and 2019 disbursement detail memoranda showing the transfers "to the credit of PRIFA."	AAFAP produced all disbursement detail memoranda that were located pursuant to a reasonably diligent search. See PRIFA_STAY0000287 - PRIFA_STAY0000299, PRIFA_STAY0000613, PRIFA_STAY0000621, PRIFA_STAY0001242 - PRIFA_STAY0001650, PRIFA_STAY0003060 - PRIFA_STAY0003114.
Identification of which account(s) comprise the Puerto Rico Infrastructure Fund, and which accounts, subaccounts, or other designations within the Commonwealth TSA are related to PRIFA or to the Puerto Rico Infrastructure Fund. The PRIFA Flow-of-Funds Summary is insufficient to satisfy this request.	It is AAFAP's understanding that, at least from 2014 to present, the term Puerto Rico Infrastructure Fund has not been understood to refer to a specific bank account or accounts or accounting designation. AAFAP has provided a flow of funds document identifying the bank accounts through which the first \$117 million in rum proceeds has passed.
All TSA Cash Flow Reports for 2015 and 2016.	The TSA Cash Flow Reports that AAFAP produced began in 2017, and as such, these reports do not exist for 2015 and 2016. See CW_STAY0000203 - CW_STAY0000953.
Documents or agreements (including, without limitation, drafts thereof) to which the Commonwealth, any Bacardi entity, and/or PRIFA is a party, relating to the Rum Taxes, the flow of funds for PRIFA bonds, and/or the use of Rum Taxes.	This request is beyond the scope of discovery allowed by Judge Dein's March 5, 2020 Order. AAFAP produced the rum producer agreements, other than the Bacardi agreement, which was already available to Movants. See PRIFA_STAY0000168 - PRIFA_STAY0000280.
Confirmation that the GDB Fondo General account (A/C No. 0704), and/or the Banco Popular General Funds account (A/C No. 2858), identifies the total amount of money held by PRIFA and/or in the Puerto Rico Infrastructure Fund.	AAFAP objects to this request because the total amount of money held by PRIFA is beyond the scope of the PRIFA lift-stay motion or the discovery allowed by Judge Dein's March 5, 2020 Order. AAFAP has provided Movants with a document that identifies the accounts through which the first \$117M of Rum Tax proceeds flowed and produced account statements from government and third-party bank records. Nothing more is required.
Confirmation that no additional documents responsive to	Based on a reasonable and diligent search, the Oversight Board has produced all documents

Topic	AAFAP's Response
PRIFA Request 8 exist.	responsive to PRIFA Request 8.

3. R4220, E6120, DeptID 0250000, Express Voucher System, and Account, Fund, DeptID, Program, and Class Values.

As explained in the March 31 letter, AAFAP is under no obligation to individually investigate each transfer of Rum Tax revenues in its accounting systems, and AAFAP has made clear it was never undertaking that exercise. AAFAP reasserts its objection that Movants request that AAFAP compile and produce accounting entries for every transfer of rum taxes from January 1, 2014 onward as untimely and unreasonable. In the spirit of compromise, we agreed to work with Treasury to determine what other materials may be available. If we receive additional materials, we will produce them to you. However, AAFAP is under no obligation to provide these materials.

4. PRIFA Lockbox Account.

AAFAP on March 31, 2020 produced the additional account statements for the PRIFA Lockbox Account held at Citibank (A/C No. [REDACTED] 9028). PRIFA_STAY0004743 - PRIFA_STAY0004840.

5. Bates Prefix Corrections

AAFAP will inform Movants, as AAFAP has been doing, if AAFAP determines that further documents were produced with an incorrect Bates prefix.

HTA Requests

1. Account Opening Documents

Alleged Outstanding Information	AAFAP's Response
<u>Oriental Bank:</u> <ul style="list-style-type: none"> Account No. [REDACTED] 9874 	AAFAP addressed this request by letter dated March 31, 2020. See Letter from E. McKeen to Movants at 3 (Mar. 31, 2020).
<u>GDB:</u> <ul style="list-style-type: none"> Account No. [REDACTED] 6048 	AAFAP addressed this request by letter dated March 31, 2020. See Letter from E. McKeen to Movants at 3 (Mar. 31, 2020).
<u>Banco Popular:</u> <ul style="list-style-type: none"> Account No. [REDACTED] 9857 Account No. [REDACTED] 5116 Account No. [REDACTED] 5210 	<p>AAFAP addressed this request with respect to Account Nos. -9857 and -5116 by letter dated March 31, 2020. See Letter from E. McKeen to Movants at 3 (Mar. 31, 2020).</p> <p>After a reasonably diligent investigation, AAFAP</p>

Alleged Outstanding Information	AAFAP's Response
	determined Account [REDACTED] 5210 did not receive any of the revenues that were historically applied to debt service on the 1968 and 1998 HTA bonds. Nonetheless, in the spirit of compromise, AAFAP produced account opening documents on March 29, 2020. See HTA_STAY0046905 - HTA_STAY0046908.

2. Bank Account Information

Alleged Outstanding Information	AAFAP's Response
<u>Banco Popular:</u> <ul style="list-style-type: none"> Account No. [REDACTED] 5210: <ul style="list-style-type: none"> No statements for Jan. 2015 – May 2016 	AAFAP conducted a reasonably diligent investigation to identify accounts that received the revenues at issue in the HTA lift-stay motion. AAFAP has produced bank account statements for the accounts it identified and has provided a summary of the flow of funds to assist Movants in understanding the materials provided. This account was not identified as having received any of the pledged revenues at issue in the HTA lift-stay motion. Nonetheless, AAFAP requested the account statements for this account from Banco Popular for the period of Jan. 2015 to present and produced all account statements that were received.
Statements, reconciliations, reports and other documents for Fund 278 between January 1, 2015 and present	Fund 278 is not a bank account. For the reasons stated in our March 31, 2020 letter, this request is beyond the scope of the discovery allowed in Judge Dein's March 5, 2020 order. In the spirit of compromise, we agreed to work with Treasury to determine what other materials may be available. If we receive additional materials, we will produce them to you. However, AAFAP is under no obligation to provide these materials.

3. Pass-through of Excise Taxes

AAFAP has already provided Movants with a summary of the relevant flow of funds pertaining to HTA, which includes the relevant accounts, and maps out how the money flows.

4. Additional Allegedly Outstanding Information.

Topic	AAFAF's Response
<p>Identification of which account(s)/fund(s) comprise the "special deposits" identified in 13 L.P.R.A. § 31751 and 9 L.P.R.A. § 31751, and which accounts, subaccounts, or other designations within the Commonwealth TSA are related to HTA or to the "special deposits." The HTA Flow-of-Funds Summary is insufficient to satisfy this request.</p>	<p>As an initial matter, 9 L.P.R.A. § 31751 is an incorrect cite. Title 9 of the Laws of Puerto Rico Annotated does not contain a section 31751. 13 L.P.R.A. § 31751 states that certain taxes "shall be covered into a special deposit in favor of the Highways and Transportation Authority for its corporate purposes."</p> <p>The thousands of pages of HTA-related bank account statements, bank account documents, transmittal information, and the HTA flow of funds summary AAFAF provided, reflect the accounts into which the tax revenues historically applied to repayment of the 1968 and 1998 resolution HTA bonds were deposited.</p>
<p>Identification of all accounts and account statements, from July 1, 2016 to present, for all accounts receiving Excise Taxes from Banco Popular Account No. [REDACTED] 9458.</p>	<p>Banco Popular Account [REDACTED] 9458 is the TSA operational account, which has hundreds of debits and credits each month. The Excise Taxes deposited into this account were commingled with other funds. The Puerto Rico Treasury Department cannot attribute any particular outflow of commingled funds to the Excise Taxes as Movants request.</p>
<p>Identification, descriptions, and statements for the following accounts, which were identified as having received monies from Banco Popular Account No. [REDACTED] 9458 for the period from July 1, 2016 to present:</p> <ul style="list-style-type: none"> • *9474 • *9482 • *9490 • *9504 • *9512 • *9539 • *9547 • *9555 • *9563 • *9571 • *1216 • *1020 	<p>Banco Popular Account [REDACTED] 9458 is the TSA operational account, which has hundreds of debits and credits each month. It would exceed the limited scope of permissible discovery and would be overly burdensome to provide all account statements for every account that received funds from the TSA operational account, given that pledged revenues are commingled and cannot be traced to any outflow in any particular account.</p>

Topic	AAFAP's Response
Confirmation that these accounts received Excise Taxes for the period from July 1, 2016 to present.	
Identification and accounting of all Excise Taxes currently held by Treasury and the location of those monies.	AAFAP objects to this request as beyond the scope of what AAFAP has agreed to provide. See ECF No. 12080, at 3. Further, AAFAP is unable to produce documents showing the precise amount in accounts attributable to Excise Taxes because retained revenues are commingled with other funds in TSA accounts. ¹³
Reconciliations for Banco Popular Account No. [REDACTED] 5191, GDB Account No. [REDACTED] 00-6, GDB Account No. [REDACTED] 427-6, Oriental Bank Account No. [REDACTED] 9874, GDB Account No. [REDACTED] 346-6, Banco Popular Account No. [REDACTED] 9458, and Banco Popular Account No. [REDACTED] 9857.	AAFAP objects to requests for reconciliations. Movants have not made such requests previously and have not explained why they have done so now. Judge Dein's order does not require AAFAP to conduct additional searches to satisfy this request.
Reconciliations for Banco Popular Account No. [REDACTED] 5116, GDB Account No. [REDACTED] 83-9, Oriental Account No. [REDACTED] 874, Banco Popular Account No. [REDACTED] 0303, Banco Popular Account No. [REDACTED] 38, and Banco Popular Account No. [REDACTED] 6411.	AAFAP objects to requests for reconciliations. Movants have not made such requests previously and have not explained why they have done so now. Judge Dein's order does not require AAFAP to conduct additional searches to satisfy this request.

* * *

The Government Parties are available to meet and confer regarding these requests.

Sincerely,

/s/ Elizabeth L. McKeen

Elizabeth L. McKeen

/s/ Michael Mervis

Michael Mervis

¹³ See Disclosure Statement, Case No. 17-3283, Dkt. No. 8766, at 84, 97 (D.P.R. Sept. 27, 2019).